

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Application of Storag Etzel GmbH for an Order, Pursuant to 28 U.S.C. § 1782, to Obtain Discovery for Use in a Foreign Proceeding

REDACTED - PUBLIC VERSION  
(Filed December 2, 2019)

Misc. C.A. No. 1:19-mc-209-CFC

[REDACTED]

**DECLARATION IN SUPPORT OF BAKER HUGHES'S MEMORANDUM  
IN OPPOSITION TO STORAG'S APPLICATION OR, ALTERNATIVELY,  
TO STAY THE PROCEEDINGS**

OF COUNSEL:

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*Attorneys for Respondent  
Baker Hughes, a GE Company, LLC*

Dated: November 22, 2019

Pursuant to 28 U.S.C. § 1746, I, [REDACTED], declare as follows:

1. I am a partner at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP (“WilmerHale”), [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]<sup>1</sup>

2. I have personal knowledge of all facts stated in this declaration, and if called to testify, I could and would testify competently thereto.

3. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]. These valves were sold to Storag by [REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED]

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<sup>1</sup> Information must be disclosed in this action relating [REDACTED] in order for BHGE to fully and fairly respond to Storag’s Application. Such information may be subject to confidentiality provisions related to [REDACTED]. Accordingly, a Motion for Leave to File Under Seal is necessary so papers in the above-captioned matter can be filed under seal in accordance with such motion and D. Del. LR 26.2 in order to protect any such information.

[REDACTED]

[REDACTED]

[REDACTED]

4. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5. [REDACTED]

[REDACTED]

6. In March 2019, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8. [REDACTED]

9. [REDACTED]

10. [REDACTED]

11. [REDACTED]

12. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13. [REDACTED] is governed by no formal German authority and is not considered a governmental body. It is not an extension of a German chamber of commerce. It is a fully independent legal body—a German *eingetragener Verein* (*i.e.*, association).

14. [REDACTED]

[REDACTED], a copy of which is attached as Exhibit E (cited portion highlighted). [REDACTED] also state that [REDACTED] is responsible for ordering document production. [REDACTED].

15. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed November 22, 2019, in London, United Kingdom.

A handwritten red ink signature, possibly "John Smith", is written above a blacked-out rectangular area.

[REDACTED]

[REDACTED]

**CERTIFICATE OF SERVICE**

I, Robert M. Vrana, hereby certify that on December 2, 2019, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

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I further certify that on December 2, 2019, I caused the foregoing document to be served via electronic mail upon the above-listed counsel and on the following:

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Dated: December 2, 2019

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